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ATTORNEY FOR CREDITOR: REGIONAL ACCEPTANCE CORPORATION

**IN THE BANKRUPTCY COURT FOR THE
DISTRICT OF NEW JERSEY (CAMDEN)
HONORABLE JERROLD N. POSLUSNY JR.**

In re: : Case No. 18-34018-JNP
:
:
ANTHONY R BROOKS, JR. :
:
SHERIE N BROOKS :
:
Debtors, :
: Chapter 13
:
: Hearing Date: April 23, 2019
:
_____ :

**NOTICE OF MOTION FOR RELIEF FROM STAY
FOR FAILURE TO MAKE PAYMENTS OUTSIDE OF PLAN**

To:

Anthony R Brooks, Jr. & Sherie N Brooks 712 Sherwood Drive Williamstown, NJ 08094	Brad J. Sadek Sadek and Cooper 1315 Walnut Street Suite 502 Philadelphia, PA 19107
Isabel C. Balboa Standing Chapter 13 Trustee Cherry Tree Corporate Center 535 Route 38 – Suite 580 Cherry Hill, NJ 08002	Office of the United States Trustee One Newark Center Suite 2100 Newark, NJ 07102

PLEASE TAKE NOTICE that Regional Acceptance Corporation, will make a motion on the 23rd day of April, 2019 at 10:00 a.m. or as soon thereafter as counsel may be heard before the Honorable Jerrold M. Poslusny, Jr. sitting at Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4th Floor, Camden, NJ 08101, Courtroom 4C for an order granting relief from the

automatic stay due to debtors' failure to make regular installment payments outside the Plan as more particularly set forth in the Certification submitted herewith. Costs and counsel fees will also be requested. The property involved is a 2014 Chrysler 300 Sedan 4D AWD 3.6L V6, VIN# 2C3CCARG6EH143245.

TAKE FURTHER NOTICE that if you contest this motion, you must appear in Court on the date noted above AND you are further required to file with the Court and serve on the undersigned a written response no later than seven (7) days prior to the hearing date set forth herein.

BERNSTEIN-BURKLEY, P.C.

/s/ Keri P. Ebeck
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